

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

RLI INSURANCE COMPANY

Plaintiff,

vs.

INDIAN RIVER SCHOOL, DISTRICT,
EDIS COMPANY, AND BECKER MORGAN
GROUP, INC.

Defendants.

)

) Civil Action No.: 05-858-JJF

)

)

)

)

)

)

)

)

DEFENDANT BECKER MORGAN GROUP, INC.'S
REQUIRED INITIAL DISCLOSURES

Defendant Becker Morgan Group, Inc. (hereinafter referred to as "BMG"), by its undersigned attorney, makes the following Initial Disclosures pursuant to F.R. Civ. P. 26(a)(1) and D. Del. L. R. 16.2:

A. Individuals likely to have discoverable information that Defendants may use to support its claims.

Defendant reserves the right to supplement the list of persons identified below as a result of further investigation, discovery, or otherwise. Defendant additionally reserves the right to rely upon information in the possession of any other person identified by the initial disclosures of other parties to this action.

1. Brad A. Hastings, AIA
Vice President - Becker Morgan Group, Inc.
Port Exchange Building
312 West Main Street,
Suite 300,
Salisbury, MD 21801
(410) 546-9100

Mr. Hastings possesses general information related to BMG's role as the architect on the Sussex Central High School construction project ("Project").

2. Theodore H. Dwyer, Jr.
President - EDiS Company
110 S. Poplar Street
Suite 400
PO Box 2697
Wilmington, DE 19805
(302) 421-5700

Mr. Dwyer may possess general Project information and information related to EDiS' role as the construction manager on the Project.

3. Sandra C. Carpenter
Project Manager for BMG
Port Exchange Building
312 West Main Street,
Suite 300,
Salisbury, MD 21801
(410) 546-9100

Ms. Carpenter possesses knowledge regarding the daily activities of BMG on the Project site.

4. Dave Van der Vossen
Director – Allen & Shariff Corporation
205 E. Market St.
Salisbury, MD 21801
(410) 341-0200

Mr. Van der Vossen may possess information related to the engineering analysis performed by Allen & Shariff on the plumbing and mechanical work on the project.

5. Don Hocking, P.E.
Allen & Shariff Corporation
205 E. Market St.
Salisbury, MD 21801
(410) 341-0200

Mr. Hocking may possess information related to the engineering analysis

performed by Allen & Shariff on the plumbing and mechanical work on the project.

6. Gregory C. Weer
Indian River School District (hereinafter "IRSD")
Supervisor of Building and Grounds
31 Hoosier Street
R.D. 2, Box 156
Selbyville, DE 19975
(302) 436-1000
7. Chris McCone
Project Manager – EDiS Company
110 S. Poplar Street
Suite 400
PO Box 2697
Wilmington, DE 19805
(302) 421-5700

B. Documents, data, compilations and tangible things in the possession, custody or control of Defendant that Plaintiff may use to support its claims.

Defendants reserve the right to supplement this response at such time as documents come to its attention as a result of further investigation, discovery, or otherwise. Defendants additionally reserve the right to rely upon documents identified by the initial disclosures of other parties to this action.

BMG is in possession of Drawings, Specifications, Material Data and Addendums for the project; Project Correspondence files for all trade contracts including applications for payment and contractor correspondence; consultant and owner correspondence; Meeting Minutes and Construction Manager monthly reports; RFI files; BMG Invoices and contract information; Samples.

The originals and/or copies of most of the documents listed above are located at BMG's

office at Port Exchange Building, 312 West Main Street, Suite 300, Salisbury, MD 21801.

C. A computation of damages claimed.

1. Answering Defendant reserves the right to supplement this response at such time as documents come to its attention as a result of further investigation, discovery, or otherwise. Answering Defendant additionally reserves the right to rely upon documents identified by the initial disclosures of other parties to this action.

D. The existence of any insurance agreements under which any person or entity carrying on an insurance business may be liable to satisfy part or all of the judgment that may be entered in this case.

1. CNA Ins. Co., 2 Wisconsin Cir., Suite 900, Chevy Chase, MD 20815.
2. A copy of the Policy Declarations page is attached hereto as Exhibit "A".

TIGHE, COTTRELL & LOGAN, P.A.

/s/ Paul Cottrell

Paul Cottrell (DE ID No.: 2391)
First Federal Plaza, Suite 500
P.O. Box 1031
Wilmington, DE 19899
(302) 658-6400
p.cottrell@lawtcl.com
Attorney for Becker Morgan Group, Inc.

Dated: September 28, 2006